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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

_____	)	
In re	)	Chapter 15
	)	
MtGox Co., Ltd. (a/k/a MtGox KK)	)	Case No. 14-31229-sgj15
	)	
Debtor in a Foreign Proceeding.	)	Resetting of Status Conference to April 30, 2014 at 9:30 a.m. Requested
_____		

**MOTION TO ADJOURN AND RESET STATUS CONFERENCE**

MtGox Co., Ltd., a/k/a MtGox KK (the “Debtor” or “MtGox”), a debtor in a civil rehabilitation proceeding under Japanese law (the “Japan Proceeding”), currently pending before the Twentieth Civil Division of the Tokyo District Court, Japan (the “Tokyo Court”), by counsel, hereby moves (the “Motion”) to adjourn the status conference currently scheduled for April 24, 2014 at 9:30 a.m. (the “Status Conference”) and reset it to April 30, 2014 at 9:30 a.m., and in support thereof respectfully states as follows:

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).

2. Venue for this proceeding is proper before this Court pursuant to 28 U.S.C. § 1410.

3. On April 16, 2014, this Court held a status conference and a hearing on the *Debtors’ Emergency Motion for Continuance of Deposition* [Dkt. No. 76]. Counsel for MtGox sought a continuance of Mr. Karpeles’ deposition following the Tokyo Court’s dismissal of the Debtor’s application for a civil rehabilitation proceeding and its subsequent order placing the Debtor in provisional administration pending an order to commence the Debtor’s bankruptcy proceeding, and appointment of Mr. Nobuaki Kobayashi as provisional administrator of the Debtor during the interim period prior to the commencement of the bankruptcy proceeding.

4. On April 17, 2014, the Court entered the Order Granting Continuance of Deposition [Dkt. No. 90] (the “Order”). Pursuant to the Order, the Status Conference is scheduled for April 24, 2014 at 9:30 a.m. or at such date and time shortly thereafter when Mr. Kobayashi can attend telephonically. In addition, the Court ordered that any interested party may submit a letter brief on the issue of the scope of the automatic stay under Japanese

bankruptcy law. The brief must be submitted with the Court by noon on the day immediately preceding the date of the Status Conference.

5. The Tokyo Court is expected to issue orders on or about April 24, 2014 regarding the bankruptcy proceeding and appointment of a trustee. The parties present at the April 16, 2014 hearing all agreed to continue the Status Conference to April 30, 2014 to allow the parties to analyze any orders issued by the Tokyo Court prior to the Status Conference.

6. Thus, by this Motion, the Debtor respectfully seeks entry of an order, substantially in the form attached hereto as **Exhibit A**, (a) adjourning and resetting the Status Conference to April 30, 2014 at 9:30 a.m.; and (b) setting 12:00 p.m. on April 29, 2014 as the deadline for submitting letter briefs on the issue of the scope of the automatic stay under Japanese bankruptcy law.

7. Counsel for the Debtor has conferred with the Office of the United States Trustee for the Northern District of Texas, counsel for plaintiffs Gregory Greene and Joseph Lack, and counsel for CoinLab, Inc. and was advised that they were not opposed to this Motion.

### **CONCLUSION**

WHEREFORE, the Debtor respectfully requests that this Court grant the Motion and enter an order, substantially in the form attached hereto as **Exhibit A**, (a) adjourning and resetting the Status Conference to April 30, 2014 at 9:30 a.m.; (b) setting 12:00 p.m. on April 29, 2014 as the deadline for submitting letter briefs on the issue of the scope of the automatic stay under Japanese bankruptcy law; and (c) granting the Debtor such other and further relief as the Court deems just and proper.

Dated: April 22, 2014  
Dallas, Texas

Respectfully submitted,

**BAKER & McKENZIE LLP**

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